

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

IN RE: \_\_\_\_\_ )  
                  )  
KELLY ANJEL SALAT         ) Case No. 20-31633-KRH  
                  )  
                  ) Chapter 13  
Debtor                 )  
\_\_\_\_\_)

**MOTION TO EXCEPT MOTION TO IMPOSE STAY FROM STANDING ORDER 20-12**

COMES NOW the Debtor, by counsel, and moves this Court to Except the Motion to Impose Stay from Standing Order 20-12, and in support thereof states as follows:

1. On March 20, 2020 (hereinafter the “Petition Date”), the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code (the “instant case”).
2. Within the year prior to filing the instant case, Debtor has been a debtor in two (2) pending Chapter 13 bankruptcy case which were filed on March 22, 2019 and dismissed on or about March 22, 2020 (Case No. 19-31518) and on May 8, 2014 and dismissed on or about February 28, 2019 (Case No. 14-32538) (the “previous cases”). In addition, the Debtor was a debtor in a Chapter 13 case filed on March 26, 2013 and dismissed on or about November 15, 2013 (Case No. 13-31666) and a Chapter 13 case filed on November 28, 2000 wherein the Debtor received a discharge on July 15, 2004 (Case No. 00-14756).
3. The most recent case was dismissed on the Chapter 13 Trustee’s Motion due to delinquent payments. In the previous case the Debtor had unforeseen expenses arise from her

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Counsel for Debtor

son's college and her daughter's wedding, which caused her to be unable to afford her Plan payments. In addition, the Debtor was separated from her spouse during the previous case. The Debtor is currently back together with her spouse, she currently has less expenses and doesn't expect any large expenses, and she will be putting in a wage directive in this case.

4. On March 31, 2020 the Court entered Standing Order 20-12 which temporarily extended deadlines in bankruptcy cases for any deadline set to fall between April 1 and April 10, 2020, which would include the deadline to respond to the Motion to Impose Stay previously filed herein.

5. To date there have been no responses filed to said Motion.

WHEREFORE, the Debtor respectfully requests that the Court Except the Motion to Impose Stay from Standing Order 20-12 so that the Motion may be granted at the originally scheduled hearing, and grant such other relief as may be deemed appropriate.

KELLY ANJEL SALAT

By: /s/ James E. Kane  
Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 6, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane  
Counsel for Debtor

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